Exhibit A

- 1. A current CV.
- 2. A copy of all materials you considered or relied upon in drafting your expert report entitled "Opinion on Canadian Tort Law as it relates to Economic Loss caused by Defective or Dangerous Products; and as to the Diverse Provincial Limitation Rules governing such claims" ("Expert Report") which was submitted in connection with these Chapter 11 proceedings.
- 3. Copies of any and all notes that exist concerning the substance or topic of your Expert Report.
- 4. Any and all communications between you and any other expert retained or consulted in connection with these Chapter 11 proceedings.